

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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BARBARA HILL,

Plaintiff,

-against-

THE DEPARTMENT OF EDUCATION OF THE CITY
OF NEW YORK

Defendant.

**DECLARATION OF
ASSISTANT CORPORATION
COUNSEL SHIVANI R.
DAMERA IN SUPPORT OF
DEFENDANT'S OPPOSITION
TO PLAINTIFF'S MOTION TO
AMEND THE COMPLAINT**

24-cv-3506-RPK-LB

Shivani R. Damera declares, pursuant to 28 U.S.C. § 1746 and under the penalty
of perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendant, New York City Department of Education (“DOE”), in the above-captioned action.
2. I respectfully submit this declaration in support of Defendant’s opposition to Plaintiff’s motion to amend the complaint
3. Annexed hereto are true and correct copies of the following documents submitted in support of Defendant’s motion:
4. Exhibit A is the March 20, 2025 Telephonic Conference Transcript.

WHEREFORE, Defendant respectfully requests that the Court deny Plaintiff leave to amend the Complaint as futile, along with any such other and further relief that the Court deems just and proper.

Dated: New York, New York
May 13, 2025

/s/ *Shivani Damera*
Shivani R. Damera
Assistant Corporation Counsel